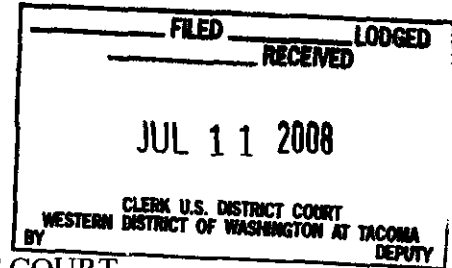




07-CV-05226-ORD

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

DAMION BROMFIELD,

Plaintiff,

v.

Charles McBurney, A. Nelson, George Wigen,
Doe McClusky, Carl Sadler, Jose Moncevias,
Michael Melendez, Jack Bennett,

Defendants.

NO. C-07-5226 RBL KLS

**STIPULATION FOR AND ORDER
OF DISMISSAL WITH PREJUDICE****NOTE ON MOTION CALENDAR:**

IT IS HEREBY STIPULATED AND AGREED between Plaintiff, Damion Bromfield, *pro se*, and Defendants McBurney, Nelson, Wigen, McClusky, Sadler, and Moncevias above named through counsel undersigned, that the above-entitled matter has been fully settled against McBurney, Nelson, Wigen, McClusky, Sadler, Moncevias, and with each party bearing their own costs. Mr. Bromfield and GEO counsel attorney Joan K. Mell have negotiated the following terms and conditions to full and finally resolve this matter and all other matters involving the parties. The parties agree that they have had an opportunity to consider these matters, which were negotiated over several hours.

Plaintiff agrees to dismiss with prejudice and never file in any jurisdiction, to include and not be limited to any federal, state, local, or administrative entity, any claim against GEO Corp or its agents or

III BRANCHES LAW, PLLC
Joan K. Mell
1033 Regents Blvd. Ste. 101
Fircrest, WA 98466
joan@3brancheslaw.com
253-566-2510 ph
281-664-4643

employees that arose prior to entry of this order. It also includes any pending appellate matters or other actions that are not known or articulated in the amended complaint.

Plaintiff acknowledges that he is agreeing to dismiss any matters arising prior to this date as to GEO Corp. and its employees and understands that any future filings referencing any matter that occurred prior to the entry of this agreement and order against GEO Corp. and its employees would be dismissed with prejudice as a matter of law based upon this agreement.

In consideration of Plaintiff's dismissal with prejudice, GEO Corp and Mr. Sadler without admitting any fault apologizes to Mr. Bromfield;

GEO Corp. has provided to Mr. Bromfield 35 telephone cards;

GEO Corp. agrees to through counsel to discuss with ICE Mr. Bromfield's concerns regarding access to library materials and the telephone policy;

Counsel will send the letter to Mr. Bromfield's former employer with a cover letter explaining the delay was due to court proceedings;

GEO Corp. will advise staff to follow their policies and procedures regarding opening of mail and reading correspondence and the INS Detention Standard regarding Telephone access.

As to future claims, plaintiff agrees to first pursue relief by submitting a kite to the captain describing the problem. Plaintiff agrees to give the Captain five days to respond. If the Captain fails to solve the problem, then the Plaintiff agrees to submit a request for relief to the Warden and give the Warden ten days to respond. If the Warden does not respond or refuses any relief, Plaintiff agrees to next submit his request for relief to GEO Counsel and give GEO counsel thirty days to respond.

GEO Counsel, presently Joan K. Mell, agrees to investigate his complaint and attempt to resolve the matter short of court action. If the matter is not resolved in thirty days by GEO Counsel Plaintiff may pursue any other remedy.

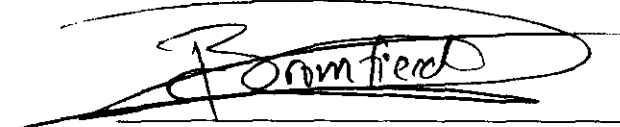
Defendant GEO employees agree to dismiss any claims against Plaintiff.

DATED this 10th day of July, 2008

III BRANCHES LAW PLLC


Joan K. Mell, WSBA #21319

Attorney for Defendants McBurney, Nelson,
Wigen, McClusky, Sadler and Moncevias


Damion Bromfield, Plaintiff *Pro Se*

ORDER

THIS MATTER coming on to be heard before the undersigned Judge of the above-entitled Court based upon the stipulation of the parties for dismissal, and the Court being fully advised in the premises, it is

ORDERED, ADJUDGED AND DECREED that the above-entitled matter be and the same is hereby dismissed with prejudice as to GEO Corp. and any of its employees or


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agents and with each party bearing their own costs.

DONE IN OPEN COURT this 14th day of July, 2008.


Judge